

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NEW YORK IMMIGRATION  
COALITION, *et. al*,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, *et. al*,

Defendant.

Civil Action No. 1:18-cv-05025-JMF  
[r: 1:18-cv-02921-JMF]

Hon. Jesse M. Furman

**PLAINTIFFS' INITIAL DISCLOSURES  
PURSUANT TO FRCP 26(A)(1)**

**PRELIMINARY STATEMENT**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs New York Immigration Coalition ("NYIC"), Casa de Maryland ("Casa"), American-Arab Anti-Discrimination Committee ("ADC"), ADC Research Institute, and Make the Road New York ("MRNY") (collectively, "Plaintiffs") hereby make the following initial disclosures. Plaintiffs have made a reasonable and good faith effort to prepare the disclosures set forth herein. However, Plaintiffs have not completed their review of the evidence in connection with this case. Consequently, other potential witnesses, subjects of information, and/or categories of documents within the scope of these disclosures may be identified as discovery proceeds and as the case develops. Therefore, Plaintiffs reserve the right to modify, amend, or supplement these disclosures at a later time as appropriate, and at any time before trial in this matter.

These disclosures are made without waiving: (i) the right to object on the grounds of competency, the attorney-client privilege, attorney work-product protections, undue burden, relevancy, materiality, hearsay or any other proper ground; (ii) the right to object to the

production or use of any information, for any purpose, in whole or in part, in any proceeding in this or any other action; or (iii) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

**I. Rule 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information that Plaintiffs May Use to Support Their Claims or Defenses**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), the chart below sets forth (1) the individuals, not including expert witnesses, that Plaintiffs have identified who are likely to have discoverable information that Plaintiffs may use to support their claims; and (2) to the extent reasonably determinable by Plaintiffs at this time, the subjects of the information about which these individuals may have knowledge. Plaintiffs have attempted to provide complete information regarding the subjects about which the identified individual has knowledge, but the individual may have knowledge of subjects in addition to, or other than, those listed. References to an individual's

employment title refers either to the individual's current or prior title.

**A. Plaintiffs**

<b>Name</b>	<b>Title</b>	<b>Subject Matter</b>	<b>Contact Information</b>
Steven K. Choi	Executive Director, New York Immigration Coalition	Mr. Choi is likely to have information about NYIC's Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs, services, and membership.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Elizabeth (Betsy) Plum	Vice-President of Policy, New York	Ms. Plum is likely to have information about NYIC's Census	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300

	Immigration Coalition	education and outreach efforts; Census-guided funding streams; and organizational mission, programs, services, and membership.	601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Elizabeth Ouyang	Coordinator, New York Counts 2020, New York Immigration Coalition	Ms. Ouyang is likely to have information about NYIC's Census education and outreach efforts.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Lindolfo Carballo	Director of Workforce Development, Education, and Employment, CASA de Maryland	Mr. Carballo is likely to have information about CASA's outreach effort made in 2010, its planning for the Census outreach effort in 2020, any anticipated diversion of its resources because of the increased effort, and the increased fear of interactions with the government on the part of its communities.	c/o Arnold & Porter Kaye Scholer LLP 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
George Escobar	Senior Director of Health and Human Services, CASA de Maryland	Mr. Escobar is likely to have information about CASA's outreach effort made in 2010, its planning for the Census outreach effort in 2020, any anticipated diversion of its resources because of the increased effort, and the increased fear of interactions with the government on the part of its	c/o Arnold & Porter Kaye Scholer LLP 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000

		communities.	
Kimberley Propeack	Chief of Politics and Communications, CASA de Maryland	Ms. Propeack is likely to have information about CASA's outreach effort made in 2010, its planning for the Census outreach effort in 2020, any anticipated diversion of its resources because of the increased effort, and the increased fear of interactions with the government on the part of its communities.	c/o Arnold & Porter Kaye Scholer LLP 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Gustavo Torres	Executive Director, CASA de Maryland	Mr. Torres is likely to have information about CASA's planning for the Census outreach effort in 2020, any anticipated diversion of its resources because of the increased effort, and the increased fear of interactions with the government on the part of its communities.	c/o Arnold & Porter Kaye Scholer LLP 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Samer Khalaf	President, American-Arab Anti-Discrimination Committee	Mr. Khalaf is likely to have information about ADC's Census education and outreach efforts; and organizational mission, programs, and membership; and the anticipated diversion of its resources because of the increased effort, because of the	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000

		increased fear of interactions with the government on the part of its communities.	
Abed A. Ayoub	National Legal and Policy Director of the American-Arab Anti-Discrimination Committee	Mr. Ayoub is likely to have information about ADC's Census education and outreach efforts; and organizational mission, programs, and membership; and the anticipated diversion of its resources because of the increases in this effort because of the increased fear of interactions with the government on the part of its communities. Mr. Ayoub is also likely to have information about reports from ADC members who have expressed fear and concern about census participation because of the addition of the citizenship question.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Nabil Mohamad	Vice-President of the American-Arab Anti-Discrimination Committee	Mr. Mohamad is likely to have information about ADC's Census education and outreach efforts; and organizational mission, programs, and membership; and the anticipated diversion of its resources because of the increases in this	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000

		effort because of the increased fear of interactions with the government on the part of its communities..	
ADC Research Institute	Same individuals as named for ADC	Mr. Khalaf, Mr. Ayoub and Mr. Mohamad are likely to have information about ADCRI's Census education and outreach efforts, and organizational mission.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Javier Valdes	Co-Executive Director, Make the Road New York	Mr. Valdes is likely to have information about MRNY's Census education and outreach efforts; Census-guided funding streams; organizational mission, programs, services, and membership.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Daniel Altschuler	Director of Civic Engagement and Research, Make the Road New York	Mr. Altschuler is likely to have information about MRNY's Census education and outreach efforts; Census-guided funding streams; organizational mission, programs, services, and membership.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Yaritza Mendez	Immigration & Civil Rights Coordinator, Make the Road New York	Ms. Mendez is likely to have information about MRNY's Census education and outreach efforts and organizational mission, programs, services, and	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000

		membership.	
Natalia Aristizabal	Co-Director of Organizing, Make the Road New York	Ms. Aristizabal is likely to have information about MRNY's Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs, services, and membership.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000

Other parties and individuals are also likely to have discoverable information that Plaintiffs may use to support their claims. These include the individuals listed below. In addition to those individuals, Plaintiffs expressly incorporate into these Initial Disclosures all of the individuals and entities that have been identified in the initial disclosures or other discovery responses of any other party in this action or related actions as individuals or entities likely to have discoverable information.

**B. Defendants**

<b>Name</b>	<b>Title</b>	<b>Subject Matter</b>	<b>Contact Information</b>
Brooke Alexander	Senior Advisor, Department of Commerce	Mr. Alexander is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was	c/o Department of Justice

		made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
Karen Dunn Kelly	Under Secretary of Commerce for Economic Affairs, Commerce Department	Ms. Dunn Kelly is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question	c/o Department of Justice



		to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
Brian Lenihan	Senior Advisor to the Chief of Staff to the Secretary of Commerce; Former Acting Assistant Secretary for Legislative and Intergovernmental Affairs	Mr. Lenihan is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census.	c/o Department of Justice
Kevin Manning	Senior Public Affairs Coordinator, Department of Commerce	Mr. Manning is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census.	c/o Department of Justice

Wilbur Ross	Secretary of Commerce	Mr. Ross is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	c/o Department of Justice
Wendy Teramoto	Chief of Staff to Secretary of Commerce	Ms. Teramoto is likely to have information	c/o Department of Justice

	Wilbur Ross	regarding communications within and outside the Commerce Department regarding the citizenship question.	
Michael Walsh	Deputy General Counsel, Department of Commerce	Mr. Walsh is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of	c/o Department of Justice

		undercounts on other federal programs and political apportionment.	
John Abowd	Chief Scientist and Associate Director for Research and Methodology, Census Bureau	Mr. Abowd is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal	c/o Department of Justice

		programs and political apportionment.	
Karen Battle	Division Chief, Population Division, Census Bureau	Ms. Battle is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Michael Berning	Acting Chief, Center for Administrative Records Research and Applications, Census Bureau	Mr. Berning is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Robert Bernstein	Stakeholder Relations Staff, Decennial Communications Coordination Office, Census Bureau	Mr. Bernstein is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding	c/o Department of Justice

		the same.	
Kaile Bower	Chief, Integrated Partnership and Communications Branch, Census Bureau	Ms. Bower is likely to have information regarding the normal process and procedures for adding questions to the Decennial Census, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Steven Buckner	Assistant Director of Communications, Census Bureau	Mr. Buckner is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Cheryl V. Chambers	Chief, Internal Communications Staff, Decennial Communications Coordination Office, Census Bureau	Ms. Chambers is likely to have information regarding communications within and outside the Commerce	c/o Department of Justice

		Department regarding the citizenship question, and the decision making process regarding the same.	
Jennifer Hunter Childs	Statistician, Census Bureau	Ms Childs is likely to have information regarding the normal process and procedures for adding questions to the Decennial Census, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Michael C. Cook Sr.	Division Chief, Public Information Office, Census Bureau	Mr. Cook is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Joanne Buenzli Crane	Associate Director for Administration and Chief Financial Officer,	Ms. Crane is likely to have information regarding motivations of the defendants in	c/o Department of Justice

	Census Bureau	deciding to add the citizenship question to the Decennial Census and the process by which the decision to add the citizenship question to the Decennial Census was made.	
Aref N. Dajani	Mathematical Statistician Center for Disclosure Avoidance Research, Census Bureau	Mr. Dajani is likely to have information regarding how providing the citizenship data at the block level would affect disclosure avoidance plans for the 2020 Census and to what extent this was considered prior to any decision that was made on adding the citizenship question.	c/o Department of Justice
James Dinwiddle	Office of the Associate Director for Decennial Census Programs, Census Bureau	Mr. Dinwiddle is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
John Eltinge	Assistant Director for Research and Methodology, Census Bureau	Mr. Eltinge is likely to have information regarding the normal process and	c/o Department of Justice



		procedures for adding questions to the Decennial Census, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts and the process by which the decision to add the citizenship question to the Decennial Census was made.	
Naomi Evangelista	Chief, Media Relations Branch, Public Information Office, Census Bureau	Ms. Evangelista is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Albert Fontenot	Associate Director for Decennial Programs, Census Bureau	Mr. Fontenot is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question	c/o Department of Justice

		to the Decennial Census was made.	
Simson L. Garfinkel	Chief, Center for Disclosure Avoidance Research, Census Bureau		c/o Department of Justice
Misty Heggeness	Branch Chief, Social, Economic, and Housing Statistics Division, Census Bureau	Ms. Heggeness is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Ron Jarmin	Acting Director, Census Bureau	Mr. Jarmin is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial	c/o Department of Justice

		Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
Christa Jones	Deputy Chief, Congressional and Intergovernmental Affairs at US Census Bureau	Ms. Jones is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census and the normal process and procedures for adding questions to the Decennial Census.	c/o Department of Justice
Shawn Klimek	Director of Research, Center for Economic Studies, Census Bureau	Mr. Klimek is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by	c/o Department of Justice

		which the decision to add the citizenship question to the Decennial Census was made.	
Francine Krasowska	Customer Experience Analyst, Center for New Media & Promotion, Census Bureau	Ms. Krasowka is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Enrique Lamas	Deputy Director and Chief Operating Officer, Census Bureau	Mr. Lamas is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department	c/o Department of Justice

		regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
Tim Olson	Director for Field Operations, Census Bureau	Mr. Olson is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Eloise Parker	Assistant Director, Demographic Programs, Census Bureau	Ms. Parker is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Sonya Rastogi	Assistant Center	Ms. Porter is likely	c/o Department of

Porter	Chief for Research, Center for Administrative Records Research and Applications, Census Bureau	to have information regarding the normal process and procedures for adding questions to the Decennial Census, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts and the process by which the decision to add the citizenship question to the Decennial Census was made.	Justice
Roberto Ramirez	Branch Chief, Ethnicity and Ancestry Statistics Branch, Population Division, Census Bureau	Mr. Ramirez is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
Burton Reist	Decennial Communications & Stakeholder Relations, Census Bureau	Mr. Reist is likely to have information regarding motivations of the defendants in deciding to add the citizenship question to the Decennial Census and the	c/o Department of Justice

		process by which the decision to add the citizenship question to the Decennial Census was made.	
Moniqua L. Roberts-Gray	Deputy Chief, Media Relations, Public Information Office, Census Bureau	Ms. Roberts-Gray is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
James Rockas	Former press Secretary and Deputy Director of Public Affairs, Department of Commerce	Mr. Rockas is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census.	
Jennifer C. Shopkorn	Senior Advisor, Communications Directorate, Census Bureau	Ms. Shopkorn is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Tara Tadlock	Congressional Affairs Office	Ms. Tadlock is likely to have	c/o Department of Justice

	Branch Chief, Office of Congressional and Intergovernmental Affairs, Census Bureau	information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	
Christine Taylor	Assistant Division Chief, Public Information Office, Census Bureau	Ms. Taylor is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
Neilan Timberlake	Program Analyst, Stakeholder Relations Staff, Decennial Communications Coordination Office, Census Bureau	Ms. Timberlake is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making process regarding the same.	c/o Department of Justice
James Treat	Assistant Director of Decennial Census Programs Directorate, Census Bureau	Mr. Treat is likely to have information regarding the impact of the citizenship question of responsiveness among certain	c/o Department of Justice



		populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	
Victoria Velkoff	Chief, American Community Survey Office, U.S. Census Bureau	Ms. Velkoff is likely to have information regarding the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the process by which the decision to add the citizenship question to the Decennial Census was made.	c/o Department of Justice
James Whitehorne	Chief, Redistricting Data Program, Census Bureau	Mr. Whitehorne is likely to have information regarding the necessity of Decennial Census data for VRA enforcement.	c/o Department of Justice
Lisa Wolfisch	Acting Director, Center for New Media & Promotion, Census Bureau	Ms. Wolfisch is likely to have information regarding communications within and outside the Commerce Department regarding the citizenship question, and the decision making	c/o Department of Justice

		process regarding the same.	
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**C. Non-Parties**

<b>Name</b>	<b>Title</b>	<b>Subject Matter</b>	<b>Contact Information</b>
Fahd Ahmed	Executive Director, Desis Rising Up and Moving (“DRUM”)	Mr. Ahmed is likely to have information about DRUM’s Census education and outreach efforts; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Steve Bannon	Former White House Chief Strategist	Mr. Bannon is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, and the impact of undercounts on other federal programs and political apportionment.	
Robert Berman	Deputy Chief, Voting Section, Civil Rights Division, Department of Justice	Mr. Berman is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, as well as the necessity of Decennial Census date to VRA enforcement.	c/o Department of Justice
Lisa Blumerman	Former Acting Associate Director for 2020 Census, Census Bureau	Ms. Blumerman is likely to have information regarding the decision to add the citizenship	Lisa Blumerman

		<p>question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.</p>	
Eric Branstad	Former Senior White House Advisor, Department of Commerce	Mr. Branstad is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census, the necessity of Decennial Census data for VRA enforcement, the process by which the	Eric Branstad

		decision was made to add the citizenship question to the Decennial Census, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
Andrew Bremberg	Assistant to the President and the Director of the Domestic Policy Council	Mr. Bremberg is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, and the impact of undercounts on other federal programs and political apportionment.	
Sarah Brinegar	Social Science Analyst, Civil Rights Division, Department of Justice	Ms. Brinegar is likely to have information around the motivations of the defendants in adding the citizenship	c/o Department of Justice

		question to the Decennial Census, as well as the necessity of Decennial Census date to VRA enforcement.	
Steven Camarota	Director of Research, Center for Immigration Studies (CIS)	Mr. Camarota is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, and the impact of undercounts on other federal programs and political apportionment.	Steven Camarota
Carlyn Cowen	Chief Policy & Public Affairs Officer, Chinese American Planning Council (“CPC”)	Ms. Cowen is likely to have information about CPC’s Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Marlenis de los Santos	N/A	Ms. de los Santos is likely to have information about the state and political subdivision in which she resides and the facilities, programs, and services that she uses that may benefit from Census-guided funding.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Arthur E. Gary	General Counsel, Justice Management Division, Department of Justice	Mr. Gary is likely to have information around the motivations of the defendants in adding the citizenship	c/o Department of Justice

		question to the decennial census, as well as the necessity of decennial census date to VRA enforcement.	
John Gore	Acting Assistant Attorney General John Gore, Civil Rights Division, Department of Justice	Mr. Gore is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, as well as the necessity of Decennial Census date to VRA enforcement.	c/o Department of Justice
Robert Groves	Former Director, Census Bureau	Mr. Groves is likely to have information on the impact of the citizenship question on responsive rates, the history of the census bureau's analysis of including the citizenship question, and the normal practices of the Census Bureau in adding a question to the Decennial Census.	Robert Groves
Hermann Habermann	Former Deputy Director, Census Bureau	Mr. Haberman is likely to have information on the impact of the citizenship question on responsive rates, the history of the census bureau's analysis of including the citizenship question, and the normal practices of the Census Bureau in	Hermann Habermann

		adding a question to the Decennial Census.	
Israel (“Izzy”) Hernandez	Former Acting Undersecretary of International Trade, Department of Commerce	Mr. Hernandez is likely to have information regarding the motivation for adding the citizenship question to the Decennial Census.	Israel (“Izzy”) Hernandez
T. Christian Herren	Chief, Voting Section, Civil Rights Division, Department of Justice	Mr. Herron is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, as well as the necessity of Decennial Census date to VRA enforcement.	c/o Department of Justice
Rama Issa-Ibrahim	Executive Director, Arab-American Association of New York (“AAANY”)	Ms. Issa-Ibrahim is likely to have information about AAANY’s Census education and outreach efforts; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Steve King	United States Representative, 4th District of Iowa	Mr. King is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census.	
Ditas Kitague	California Census Coordinator	Ms. Kitague is likely to have information on the effects on response rates of adding a citizenship question to Census.	
Kris Kobach	Secretary of	Mr. Kobach is likely	

	State of Kansas	to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, and the impact of undercounts on other federal programs and political apportionment.	
Linda Lee	Executive Director, Korean Community Services of Metropolitan New York (“KCSMNY”)	Ms. Lee is likely to have information about KCSMNY’s Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Mae Lee	Chinese Progressive Association (“CPA”)	Ms. Lee is likely to have information about CPA’s Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Perla Lopez	N/A	Ms. Lopez is likely to have information about the state and political subdivision in which she resides and the facilities, programs, and services that she uses that may benefit from Census-guided funding.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Ray López	Director of Programs and Director of Environmental Health, LSA	Mr. Lopez is likely to have information about LSA’s Census-guided funding streams; and	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743



	Family Health Services (“LSA”)	organizational mission, programs and services.	(202) 942-5000
Aracelis Lucero	Executive Director, Masa	Ms. Lucero is likely to have information about Masa’s Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Alejandra Martin	N/A	Ms. Martin is likely to have information about the state and political subdivision in which she resides and the facilities, programs, and services that she uses that may benefit from Census-guided funding.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Laura McQuade	President and Chief Executive Officer, Planned Parenthood of New York City (“PPNYC”)	Ms. McQuade is likely to have information about KCSMNY’s Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Larry McReynolds	Executive Director, Family Health Centers at NYU Langone	Mr. McReynolds is likely to have information about Family Health Centers at NYU Langone’s Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Stephen Miller	Senior Advisor to the President	Mr. Miller is likely to have information	

		around the motivations of the defendants in adding the citizenship question to the Decennial Census, and the impact of undercounts on other federal programs and political apportionment.	
Amy O'Hara	Former Head of Census Bureau's Center for Administrative Records Research and Applications	Ms. O'Hara is likely to have information on Census' ability to use administrative match data to fulfill the request for citizenship data in order to help enforce the VRA.	
Ben Overholt	Statistician, Civil Rights Division, Department of Justice	Mr. Overholt is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, as well as the necessity of Decennial Census data to VRA enforcement.	c/o Department of Justice
John Park	Executive Director, MinKwon Center for Community Action ("MinKwon")	Mr. Park is likely to have information about MinKwon's Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Nancy Potok	Chief statistician of the United States, within the Office of	Ms. Potok is likely to have information regarding the necessity of	

	Management and Budget	Decennial Census data for VRA enforcement, the normal process and procedures for adding questions to the Decennial Census, communications outside the Commerce Department regarding the citizenship question, the impact of the citizenship question of responsiveness among certain populations, foreseeable undercounts, and the impact of undercounts on other federal programs and political apportionment.	
William Spisak	Program Director, Chhaya Community Development Corporation (“Chhaya”)	Mr. Spisak is likely to have information about Chhaya’s Census education and outreach efforts; Census-guided funding streams; and organizational mission, programs and services.	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743 (202) 942-5000
Dan Torres	Director of Immigrant Integration	Mr. Torres is likely to have information on the effects on response rates of adding a citizenship question to Census.	
Yatziri Tovar	N/A	Ms. Tovar is likely to have information about the state and political subdivision in which she resides	c/o Arnold & Porter Kaye Scholer LLP (212) 607-3300 601 Massachusetts Ave, N.W. Washington, DC 20001-3743

		and the facilities, programs, and services that she uses that may benefit from Census-guided funding.	(202) 942-5000
Arturo Vargas	Executive Director of NALEO Educational Fund	Mr. Vargas is likely to have information on the effects on response rates of adding a citizenship question to Census.	
Rebecca Wertz	Deputy Chief, Voting Section, Civil Rights Division, Department of Justice	Ms. Wertz is likely to have information around the motivations of the defendants in adding the citizenship question to the Decennial Census, as well as the necessity of Decennial Census date to VRA enforcement.	c/o Department of Justice

## **II. FRCP 26(a)(1)(A)(ii): Documents**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), Plaintiffs identify the following categories and locations of documents as likely to contain information relevant to disputed matters in this case that Plaintiffs may use to support their claims, unless solely for impeachment. These disclosures relate solely to documents within Plaintiffs' possession, custody, or control. The categories below reflect those that Plaintiffs have identified as of the date of this disclosure and may not reflect all categories of documents in Plaintiffs' possession, custody, or control. Plaintiffs reserve the right to supplement or amend these categories. By setting forth this information, Plaintiffs do not admit the relevance or admissibility of any category or any document in any category; nor do Plaintiffs acknowledge that any request for documents comprising all or part of any of these categories would be reasonably calculated to lead the discovery of admissible evidence in this

case, or that the request is otherwise appropriate. Plaintiffs expressly reserve the right to object to and/or withhold production of any documents in any of the categories set forth below. These documents are in the form of electronically stored information or hard copy documents. Plaintiffs reserve the right to use any relevant evidence in support of its claims, regardless of the categories listed below.

**A. Categories of Documents**

- Documents related to Plaintiffs' Census education and outreach efforts and the effect of the citizenship question on those efforts
- Documents related to Plaintiffs' Census-guided funded streams
- Documents related to Plaintiffs' organizational missions, programs, membership, and services, and the immigrant communities of color that Plaintiffs serve.

**B. Location of Documents**

The above categories of documents include Plaintiffs' electronic and hard-copy documents. The electronic documents are located on the computer systems for Plaintiffs and on individual media. Documents potentially related to Plaintiffs' complaints are located at Plaintiffs' offices, whose addresses are as follows:

<b>Plaintiff</b>	<b>Location of Documents</b>
New York Immigration Coalition	131 W 33rd Street, Ste 610, New York, NY 10001
Casa de Maryland	8151 15th Ave Langley Park, MD 20783
American-Arab Discrimination Committee	1705 DeSales St., NW, Suite 500, Washington DC 20036
ADC Research Institute	1705 DeSales St., NW, Suite 500, Washington DC 20036
Make the Road New York	301 Grove Street, Brooklyn, NY 11237

Plaintiffs' investigation is ongoing. If, as the case develops, Plaintiffs identify additional documents or categories of documents in their possession, custody or control that supports their claims, Plaintiffs will identify them in supplemental disclosures as required under Fed. R. Civ. P. 26(e).

**III. Rule 26(a)(1)(A)(iii): Computation of Plaintiffs' Damages**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii), other than fees and costs to which it may be entitled under applicable law, Plaintiffs do not seek damages for this matter from Defendants at this time.

**IV. Rule 26(a)(1)(A)(iv): Insurance Policies**

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iv), Plaintiffs have no applicable insurance agreements to disclose.

Dated: July 23, 2018

ARNOLD & PORTER KAYE SCHOLER LLP  
AMERICAN CIVIL LIBERTIES UNION

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